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CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY                     

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2008 Grand Jury

**08-01167**

11	UNITED STATES OF AMERICA,	)	CR 08-
12		)	
12	Plaintiff,	)	<u>I N D I C T M E N T</u>
13		)	
13	v.	)	[21 U.S.C. §§ 846, 841(a)(1),
14	SHAUNTA TAYLOR,	)	841(b)(1)(C): Conspiracy to
	aka "Capone,"	)	Distribute and Possess With
15	TERRELL CARTER,	)	Intent to Distribute Oxycodone;
	aka "Mel,"	)	21 U.S.C. §§ 841(a)(1),
16	LINDA WALKER,	)	841(b)(1)(C): Possession with
	aka "Mama Linda,"	)	Intent to Distribute Oxycodone;
17	KARL WATSON,	)	18 U.S.C. § 924(c)(1)(A):
	aka "Big Watt,"	)	Possession of Firearm in
18	RONALD WASHINGTON,	)	Furtherance of a Drug
	aka "Ronnie,"	)	Trafficking Crime; 18 U.S.C.
19	MICHAEL COOK,	)	§ 922(g): Felon in Possession
	aka "Young Mike,"	)	of a Firearm; 21 U.S.C.
20	MARCUS WASHINGTON,	)	§ 843(b): Use of a
	aka "Baby Watt,"	)	Communication Facility in
21	SEVANTREL NETTLES,	)	Committing a Felony Drug
	aka "Trell,"	)	Offense]
22	WALTER KINCAID,	)	
	aka "Wa-Wa,"	)	
23	FNU LNU,	)	
	aka "Isha,"	)	
24	MAURICE WILLIAMS,	)	
	aka "Mo,"	)	
25	GEORGINA MAY,	)	
	CHARLES BROWN,	)	
26	aka "Snoop,"	)	
	DEBRA BUTLER,	)	
27	CHERYL LYNN TOUSAND,	)	
	CURTIS JONES,	)	
28		)	

FNU LNU,  
     aka "Ace," and  
 MONIQUE DAVENPORT,  
                     Defendants.

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(C)]

### A. OBJECTS OF THE CONSPIRACY

Beginning on an unknown date, and continuing until on or about February 22, 2008, in Los Angeles County, within the Central District of California, and elsewhere, defendants SHAUNTA TAYLOR, also known as ("aka") "Capone" ("TAYLOR"), TERRELL CARTER, aka "Mel" ("CARTER"), LINDA WALKER, aka "Mama Linda" ("WALKER"), KARL WATSON, aka "Big Watt" ("WATSON"), RONALD WASHINGTON, aka "Ronnie" ("R. WASHINGTON"), MICHAEL COOK, aka "Young Mike" ("COOK"), MARCUS WASHINGTON, aka "Baby Watt" ("M. WASHINGTON"), SEVANTREL NETTLES, aka "Trell" ("NETTLES"), WALTER KINCAID, aka "Wa-Wa" ("KINCAID"), First Name Unknown ("FNU") Last Name Unknown ("LNU"), aka "Isha" ("ISHA"), MAURICE WILLIAMS, aka "Mo" ("WILLIAMS"), GEORGINA MAY ("MAY"), CHARLES BROWN, aka "Snoop" ("BROWN"), DEBRA BUTLER ("BUTLER"), CHERYL LYNN TOUSAND

("TOUSAND"), CURTIS JONES ("JONES"), FNU LNU, aka "Ace" ("ACE"), and MONIQUE DAVENPORT ("DAVENPORT"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally (i) distribute and (ii) possess with intent to distribute, oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

1 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
2 ACCOMPLISHED

3 The objects of the conspiracy were to be accomplished in  
4 substance as follows:

5 1. Defendants TAYLOR and CARTER would obtain oxycodone  
6 through various sources of supply throughout Southern California,  
7 transport oxycodone to various distributors located in the state  
8 of Washington, and coordinate the collection of proceeds from the  
9 sales of oxycodone.

10 2. Defendants WATSON, COOK, M. WASHINGTON, NETTLES,  
11 BUTLER, and TOUSAND would supply oxycodone to defendants TAYLOR  
12 and CARTER.

13 3. Defendants WALKER, WILLIAMS, MAY, BROWN, and ISHA would  
14 receive oxycodone sent by defendants TAYLOR and CARTER for  
15 further distribution to customers in the state of Washington.

16 4. Defendant R. WASHINGTON would assist defendants TAYLOR  
17 and CARTER by transporting oxycodone to the state of Washington.

18 5. Defendant KINCAID would assist defendant TAYLOR by  
19 contacting sources of supply about the availability of oxycodone  
20 for sale and reporting the results of these contacts to defendant  
21 TAYLOR.

22 6. Defendant JONES would provide cash to defendants TAYLOR  
23 and CARTER in order for them to acquire oxycodone, and would  
24 provide advice to defendant TAYLOR on how to avoid detection by  
25 law enforcement.

26 7. Defendant ACE would assist defendant TAYLOR by  
27 providing defendant TAYLOR with the name and telephone number of  
28 an oxycodone supplier, and with the prices and quantities of

1 oxycodone for sale by the supplier.

2 8. Defendant DAVENPORT would assist defendant TAYLOR by  
3 obtaining airline reservations and tickets for defendant TAYLOR.

4 C. OVERT ACTS

5 In furtherance of the conspiracy and to accomplish the  
6 objects of the conspiracy, the defendants and others known and  
7 unknown to the Grand Jury committed various overt acts, on or  
8 about the following dates and times, within the Central District  
9 of California and elsewhere, including but not limited to the  
10 following:

11 In January 2008, Defendants Taylor and Carter Transport  
12 a Shipment of Oxycodone to Seattle, Washington

13 1. In January 2008, defendants WATSON, M. WASHINGTON, and  
14 NETTLES provided oxycodone pills to defendant TAYLOR.

15 2. In January 2008, defendants WATSON and NETTLES  
16 inadvertently provided counterfeit OxyContin (a trade name for  
17 one brand of oxycodone medication) pills to defendant TAYLOR.

18 3. On January 8, 2008, defendant JONES withdrew  
19 approximately \$18,000 in cash from a Bank of America account in  
20 his name.

21 4. On January 14, 2008, defendant TAYLOR purchased a train  
22 ticket for defendant R. WASHINGTON to travel from Los Angeles,  
23 California, to Seattle, Washington.

24 5. On January 17, 2008, in the morning, defendant TAYLOR  
25 drove defendant R. WASHINGTON to a train station in Los Angeles,  
26 California.

27 6. On January 17, 2008, at 9:32 a.m., using coded language  
28 in a telephone conversation, defendant TAYLOR told defendant

1 CARTER that defendant TAYLOR instructed defendant R. WASHINGTON  
2 that if any metal detectors were present at the train station,  
3 defendant R. WASHINGTON was to take the bus to Seattle,  
4 Washington.

5 7. On January 17, 2008, in the morning, defendant R.  
6 WASHINGTON boarded a Seattle-bound train at a train station in  
7 Los Angeles, California, carrying oxycodone pills.

8 8. On January 17, 2008, at 10:09 a.m., using coded  
9 language in a telephone conversation, defendant R. WASHINGTON  
10 informed defendant TAYLOR that defendant R. WASHINGTON had  
11 oxycodone pills secreted in a compartment.

12 9. On January 17, 2008, at 3:46 p.m., using coded language  
13 in a telephone conversation, defendant TAYLOR told defendant  
14 CARTER how the proceeds from the sale of oxycodone were to be  
15 divided among defendants TAYLOR, CARTER, WATSON, M. WASHINGTON,  
16 and NETTLES.

17 10. On January 17, 2008, defendant WALKER obtained an  
18 airplane ticket for defendant TAYLOR to fly from Los Angeles  
19 International Airport ("LAX") to Seattle, Washington.

20 11. On January 17, 2008, in the evening, defendant TAYLOR  
21 boarded a flight from LAX to Seattle, Washington.

22 12. On January 17 and 18, 2008, defendant CARTER placed  
23 numerous phone calls to defendant R. WASHINGTON in order to check  
24 on the status of defendant R. WASHINGTON.

25 13. On January 18, 2008, defendant CARTER traveled from Los  
26 Angeles to Seattle, Washington, and met with defendants TAYLOR  
27 and R. WASHINGTON in Seattle, Washington.  
28

1       14. On January 18, 2008, using coded language in a  
2 telephone conversation, defendant ISHA, located in the Seattle,  
3 Washington area, confirmed with defendant TAYLOR that her  
4 customer wanted to purchase 100 oxycodone pills from defendant  
5 TAYLOR.

6       15. On January 18, 2008, at 12:57 p.m. and 8:50 p.m., using  
7 coded language in telephone conversations, defendant TAYLOR  
8 agreed to sell defendant WILLIAMS 50 oxycodone pills the next  
9 day.

10       16. On January 18, 2008, at 4:08 p.m., using coded language  
11 in a voicemail message, defendant MAY asked defendant TAYLOR  
12 whether defendant TAYLOR would be ready to supply defendant MAY  
13 with oxycodone that evening.

14       17. On January 19, 2008, in the early morning, defendant  
15 TAYLOR picked up defendant R. WASHINGTON, who was carrying  
16 oxycodone, from a train station in and around Seattle,  
17 Washington.

18       18. On January 19, 2008, at 1:30 a.m., using coded language  
19 in a telephone conversation, defendant TAYLOR informed defendant  
20 WALKER that defendants TAYLOR and R. WASHINGTON were driving  
21 toward her residence with oxycodone.

22       19. On January 19, 2008, in the early morning, defendants  
23 TAYLOR and R. WASHINGTON transported oxycodone to defendant  
24 WALKER's residence in Tacoma, Washington, and provided oxycodone  
25 to defendant WALKER.

26       20. On January 19, 2008, at 9:07 a.m., using coded language  
27 in a telephone conversation, defendant WILLIAMS ordered 50  
28 oxycodone pills from defendant TAYLOR.

1        21. On January 19, 2008, at 9:10 a.m., using coded language  
2 in a telephone conversation, defendant TAYLOR informed defendant  
3 WATSON that some of the pills supplied by defendant WATSON were  
4 counterfeit OxyContin.

5        22. On January 19, 2008, at 10:27 a.m., using coded  
6 language in a telephone conversation, defendant TAYLOR asked  
7 defendant WALKER to count all of the counterfeit OxyContin pills.

8        23. On January 19, 2008, at 10:48 a.m., using coded  
9 language in a telephone conversation, defendant TAYLOR informed  
10 defendant ISHA that he possessed oxycodone for sale.

11       24. On January 19, 2008, at 11:03 a.m., using coded  
12 language in a telephone conversation, defendants TAYLOR and ISHA  
13 agreed to meet in Tacoma, Washington, in order for defendant  
14 TAYLOR to sell oxycodone to an unindicted co-conspirator.

15       25. On January 19, 2008, in the early afternoon, at a mall  
16 in Tacoma, Washington, defendant TAYLOR provided oxycodone to  
17 defendant ISHA.

18       26. On January 19, 2008, at 12:19 p.m., using coded  
19 language in a telephone conversation, defendant BROWN agreed to  
20 purchase 355 oxycodone pills from defendant TAYLOR.

21       27. On January 20, 2008, at 11:54 a.m., using coded  
22 language in a telephone conversation, defendant TAYLOR informed  
23 an unindicted co-conspirator that defendant WALKER had provided  
24 defendant TAYLOR with \$3,600 of narcotics proceeds and that  
25 defendant TAYLOR had sold 400 oxycodone pills to defendant BROWN.

26       28. On January 20, 2008, at 1:21 p.m., using coded language  
27 in a telephone conversation, defendant TAYLOR instructed  
28 defendant WATSON on how to identify counterfeit OxyContin pills.

1           29. On January 20, 2008, at 3:25 p.m., using coded language  
2 in a telephone conversation, defendant MAY told defendant TAYLOR  
3 that defendant BROWN would call defendant TAYLOR in half an hour.

4           30. On January 20, 2008, at 4:28 p.m., using coded language  
5 in a telephone conversation, defendant WILLIAMS ordered 25  
6 oxycodone pills from defendant TAYLOR.

7           31. On January 21, 2008, at 11:05 a.m., using coded  
8 language in a telephone conversation, defendant WILLIAMS ordered  
9 100 oxycodone pills from defendant TAYLOR.

10          32. On January 23, 2008, defendant TAYLOR sold several  
11 oxycodone pills to an unindicted co-conspirator.

12          33. On January 23, 2008, at 2:25 p.m., using coded language  
13 in a telephone conversation, defendant TAYLOR informed defendant  
14 JONES that defendant TAYLOR did not make as much profit from the  
15 recent oxycodone sale because of the counterfeit OxyContin and  
16 that defendant TAYLOR did pay defendant R. WASHINGTON for his  
17 work as a courier.

18          34. On January 23, 2008, in Los Angeles County, defendant  
19 TAYLOR provided money to defendant JONES.

20          35. On January 23, 2008, using coded language in a  
21 telephone conversation, defendant ISHA told defendant TAYLOR that  
22 she had a customer who would be ready to purchase 100 oxycodone  
23 pills from defendant TAYLOR the next day.

24          36. On January 24, 2008, at 9:23 p.m., using coded language  
25 in a telephone conversation, defendant NETTLES informed defendant  
26 TAYLOR that defendant NETTLES would get defendant NETTLES's money  
27 back from the supplier of the counterfeit pills and that  
28

1 defendant NETTLES did not think the supplier of the counterfeit  
2 pills knew the pills were counterfeit.

3 37. On January 25, 2008, at 4:31 p.m., using coded language  
4 in a telephone conversation, defendants TAYLOR and WATSON agreed  
5 to meet in order for defendant TAYLOR to provide narcotics  
6 proceeds to defendant WATSON.

7 In January and February 2008, Defendant Taylor Attempted to  
8 Transport Oxycodone to Seattle, Washington

9 38. On January 27, 2008, at 8:32 a.m., using coded language  
10 in a telephone conversation, defendant NETTLES agreed with  
11 defendant TAYLOR that defendant NETTLES would purchase all of the  
12 available oxycodone from defendant NETTLES's source of supply.

13 39. On January 27, 2008, at 6:27 p.m., and January 28,  
14 2008, at 12:25 p.m., using coded language in telephone  
15 conversations, defendant NETTLES informed defendant TAYLOR of the  
16 results of his contacts with oxycodone suppliers.

17 40. On January 31, 2008, at 6:03 p.m., using coded language  
18 in a telephone conversation, defendant KINCAID informed defendant  
19 TAYLOR of the results of his contacts with an oxycodone supplier.

20 41. On January 31, 2008, at 4:25 p.m., using coded language  
21 in a telephone conversation, defendant TAYLOR informed defendant  
22 NETTLES of the identity of a pharmacy.

23 42. On January 31, 2008, at 6:05 p.m., using coded language  
24 in a telephone conversation, defendant KINCAID described to  
25 defendant TAYLOR the type of oxycodone available for purchase by  
26 defendant KINCAID's oxycodone supplier.

27 43. On February 1, 2008, at 2:45 p.m., using coded language  
28 in a telephone conversation, defendant NETTLES informed defendant

1 TAYLOR that defendant NETTLES had contacted an oxycodone  
2 supplier.

3 44. On February 4, 2008, at 12:09 p.m., using coded  
4 language in a telephone conversation, defendant KINCAID informed  
5 defendant TAYLOR that defendant KINCAID located a person with a  
6 prescription for oxycodone.

7 45. On February 5, 2008, at 10:58 a.m., using coded  
8 language in a telephone conversation, defendant KINCAID told  
9 defendant TAYLOR that his supplier had generic oxycodone and  
10 would obtain a prescription for oxycodone later that month, and  
11 that defendant KINCAID had contacted other suppliers of  
12 oxycodone.

13 46. On February 7, 2008, at 10:24 p.m., using coded  
14 language in a telephone conversation, defendant TAYLOR agreed to  
15 supply defendant ISHA's customer with 100 oxycodone pills.

16 47. On February 9, 2008, at 10:37 a.m., using coded  
17 language in a telephone conversation, defendant TAYLOR agreed  
18 with defendant TOUSAND to purchase all of the oxycodone acquired  
19 by defendant TOUSAND at \$20 per oxycodone pill.

20 48. On February 9, 2008, at 6:25 p.m., using coded language  
21 in a telephone conversation, defendant TAYLOR asked defendant  
22 WATSON if defendant WATSON had oxycodone pills to provide to  
23 defendant TAYLOR.

24 49. On February 11, 2008, at 2:04 p.m., using coded  
25 language in a telephone conversation, defendant TOUSAND agreed to  
26 sell defendant TAYLOR two bottles of oxycodone in the next two  
27 days.

28 50. On February 13, 2008, at 7:01 a.m., using coded

1 language in a telephone conversation, defendant TAYLOR explained  
2 to defendant DAVENPORT that defendant TAYLOR trafficked oxycodone  
3 to the state of Washington.

4 51. On February 13, 2008, at 7:01 a.m., using coded  
5 language in a telephone conversation, defendant DAVENPORT agreed  
6 with defendant TAYLOR to participate in defendant TAYLOR's scheme  
7 to distribute oxycodone.

8 52. On February 13, 2008, at 9:23 a.m., using coded  
9 language in a telephone conversation, defendant ISHA agreed with  
10 defendant TAYLOR to tell her customer to purchase 200 oxycodone  
11 pills from defendant TAYLOR.

12 53. On February 13, 2008, at 9:30 a.m., defendant DAVENPORT  
13 provided defendant TAYLOR with available times for flights to and  
14 from Seattle, Washington.

15 54. On February 13, 2008, at 10:28 a.m., using coded  
16 language in a telephone conversation, defendants ACE and TAYLOR  
17 agreed that defendant ACE would call defendant ACE's supplier in  
18 order to obtain more information on the 600 oxycodone pills for  
19 sale by the supplier.

20 55. On February 13, 2008, at 10:44 a.m., using coded  
21 language in a telephone conversation, defendant ACE informed  
22 defendant TAYLOR that his source of supply for oxycodone was  
23 defendant COOK and provided defendant TAYLOR with defendant  
24 COOK's telephone number.

25 56. On February 13, 2008, at 10:50 a.m., using coded  
26 language in a telephone conversation, defendants TAYLOR and COOK  
27 agreed that defendant TAYLOR would purchase 90 oxycodone pills  
28 from defendant COOK for \$1500.

1           57. On February 13, 2008, defendant DAVENPORT purchased a  
2 plane ticket for defendant TAYLOR to travel to the state of  
3 Washington.

4           58. On February 13, 2008, at 1:47 p.m., using coded  
5 language in a telephone conversation, defendants TAYLOR and COOK  
6 agreed to obtain oxycodone from a pharmacy by using a third party  
7 who possessed a prescription for oxycodone.

8           59. On February 13, 2008, at 3:28 p.m., defendant NETTLES  
9 informed defendant TAYLOR that he did not know any suppliers with  
10 oxycodone for sale.

11           60. On February 13, 2008, at 5:48 p.m. and 6:08 p.m., using  
12 coded language in telephone conversations, defendants TOUSAND and  
13 TAYLOR agreed to meet at a restaurant on the corner of Jefferson  
14 Boulevard and La Brea Avenue in Los Angeles, California, in order  
15 for defendant TOUSAND to provide defendant TAYLOR with an  
16 oxycodone bottle.

17           61. On February 14, 2008, at 10:10 a.m., using coded  
18 language in a telephone conversation, defendants TAYLOR and  
19 WATSON discussed the next shipment of oxycodone to the state of  
20 Washington and the profit margin for the sale of oxycodone.

21           62. On February 14, 2008, at 11:38 a.m., using coded  
22 language in a telephone conversation, defendant JONES informed  
23 defendant TAYLOR that a source of supply did not have oxycodone  
24 available and that defendant JONES agreed to provide money to  
25 defendant CARTER.

26           63. On February 15, 2008, in the evening, near a bank on  
27 the corner of Manchester Avenue and Central Avenue, in Los  
28 Angeles, California, defendant TOUSAND provided defendant TAYLOR

1 with oxycodone.

2 64. On February 16, 2008, at 1:27 p.m., using coded  
3 language in a telephone conversation, defendant WATSON told  
4 defendant TAYLOR that defendant WATSON was ready to deliver  
5 oxycodone pills to defendant TAYLOR.

6 65. On February 16, 2008, at 6:36 p.m., using coded  
7 language in a telephone conversation, defendants TAYLOR and  
8 WATSON agreed to meet in order for defendant WATSON to provide  
9 oxycodone pills to defendant TAYLOR.

10 66. On February 16, 2008, at 9:26 p.m., using coded  
11 language in a telephone conversation, defendant TOUSAND informed  
12 defendant TAYLOR that she was unable to procure oxycodone from  
13 several local pharmacies.

14 67. On February 17, 2008, at 1:54 p.m., using coded  
15 language in a telephone conversation, defendant TAYLOR informed  
16 defendant M. WASHINGTON that defendant TAYLOR expected to obtain  
17 oxycodone in the near future.

18 68. On February 17, 2008, at 1:54 p.m., using coded  
19 language in a telephone conversation, defendant TAYLOR instructed  
20 defendant M. WASHINGTON to purchase oxycodone from defendant M.  
21 WASHINGTON's supplier and assured defendant M. WASHINGTON that if  
22 the pills purchased by defendant M. WASHINGTON were counterfeit  
23 that defendant TAYLOR would get a refund.

24 69. On February 17, 2008, at 2:13 p.m., using coded  
25 language in a telephone conversation, defendant TAYLOR instructed  
26 defendant TOUSAND to go to a Walgreen's pharmacy, located in Los  
27 Angeles County, in order to more easily acquire oxycodone pills.

28 70. On February 17, 2008, at 10:15 p.m., using coded

1 language in a telephone conversation, defendants TAYLOR and MAY  
2 agreed on a purchase price for oxycodone pills that defendant  
3 TAYLOR would supply to defendant MAY.

4 71. On February 17, 2008, at 1:07 p.m., using coded  
5 language in a telephone conversation, defendants WILLIAMS and  
6 TAYLOR agreed on a quantity of oxycodone pills that defendant  
7 WILLIAMS would obtain from defendant TAYLOR.

8 72. On February 18, 2008, at 1:13 p.m., using coded  
9 language in a telephone conversation, defendant MAY informed  
10 defendant TAYLOR that she believed defendant BROWN wanted to  
11 purchase between 400 and 600 oxycodone pills from defendant  
12 TAYLOR.

13 73. On February 18, 2008, in the late afternoon, defendant  
14 R. WASHINGTON drove defendant TAYLOR to LAX.

15 74. On February 18, 2008, at 6:35 p.m., at LAX, defendant  
16 TAYLOR carried 495 oxycodone pills inside a piece of luggage  
17 while waiting to board a flight to Seattle, Washington.

18 75. On February 18, 2008, using coded language in a  
19 telephone conversation, defendants TAYLOR and BUTLER agreed on a  
20 plan to acquire the oxycodone pills seized by law enforcement at  
21 LAX earlier that day.

22 76. On February 18, 2008, at 7:14 p.m., defendant R.  
23 WASHINGTON agreed to pick up defendant TAYLOR from LAX.

24 77. On February 19, 2008, at 10:18 a.m. and 10:30 a.m., in  
25 telephone conversations with personnel at the United States Drug  
26 Enforcement Administration ("DEA"), defendant BUTLER tried to  
27 acquire the 495 oxycodone pills seized by law enforcement from  
28 defendant TAYLOR at LAX on the previous day.

1       78. On February 19, 2008, at 11:21 a.m., using coded  
2 language in a telephone conversation, defendant ISHA told  
3 defendant TAYLOR that her customers were upset at defendant  
4 TAYLOR's failure to supply them with oxycodone.

5       79. On February 19, 2008, at 3:11 p.m., using coded  
6 language in a telephone conversation, defendant WALKER agreed  
7 with defendant TAYLOR that defendant WALKER would purchase 450  
8 oxycodone pills from defendant TAYLOR.

9       80. On February 19, 2008, at 3:40 p.m., using coded  
10 language in a telephone conversation, defendant BUTLER updated  
11 defendant TAYLOR on the progress of her efforts to acquire the  
12 495 oxycodone pills seized by law enforcement at LAX on the  
13 previous day.

14       81. On February 19, 2008, at 7:30 p.m., using coded  
15 language in a telephone conversation, defendant TAYLOR informed  
16 defendant WILLIAMS that law enforcement had seized his oxycodone  
17 and, as a result, defendant TAYLOR would change his method of  
18 transporting oxycodone.

19       82. On February 20, 2008, at 11:21 a.m., in a telephone  
20 conversation with DEA personnel, defendant BUTLER stated that  
21 defendant BUTLER had accidentally packed oxycodone in her  
22 "nephew's" clothes.

23       83. On February 20, 2008, using vague and coded language in  
24 a telephone conversation, at 1:39 p.m., defendant TAYLOR informed  
25 defendant CARTER that defendant TAYLOR had ceased efforts to  
26 obtain the oxycodone seized by law enforcement at LAX and,  
27 instead, intended to purchase available oxycodone from defendant  
28 TOUSAND.

In February 2008, Defendant Taylor Arranges Another Shipment  
of Oxycodone to Seattle, Washington

84. On February 20, 2008, at 4:04 p.m., using coded language in a telephone conversation, defendant M. WASHINGTON informed defendant TAYLOR that defendant M. WASHINGTON contacted an unindicted co-conspirator, and tried to purchase oxycodone from that person.

85. On February 21, 2008, at 1:23 p.m., using coded language in a telephone conversation, defendant TAYLOR provided defendant COOK with the names of pharmacies where defendant COOK could obtain oxycodone.

86. On February 22, 2008, at 1:22 p.m., using coded language in a telephone conversation, defendant M. WASHINGTON informed defendant TAYLOR that defendant M. WASHINGTON had 50 oxycodone pills to provide to defendant TAYLOR.

87. On February 22, 2008, at 2:22 p.m., defendant COOK drove to a pharmacy in Los Angeles in order to obtain oxycodone.

88. On February 22, 2008, at 3:57 p.m., defendant TAYLOR updated defendant JONES on his efforts to acquire oxycodone and his plan to drive to Seattle, Washington, to sell oxycodone.

89. On February 22, 2008, at 4:33 p.m., using coded language in a telephone conversation, defendant COOK informed defendant TAYLOR that personnel at a pharmacy informed defendant COOK that the pharmacy would receive a shipment of oxycodone on the following Monday.

90. On February 22, 2008, in the late afternoon, defendant COOK drove to another pharmacy in the Los Angeles area in order to obtain oxycodone.

1        91. On February 22, 2008, at 5:58 p.m., using coded  
2 language in a telephone conversation, defendant COOK informed  
3 defendant TAYLOR that defendant COOK almost purchased oxycodone  
4 at a pharmacy but the pharmacy needed approval from Medicare.

5        92. On February 22, 2008, at 6:40 p.m., using coded  
6 language in a telephone conversation, defendant TAYLOR informed  
7 defendant MAY that defendant TAYLOR would be in Seattle,  
8 Washington, the following day.

9        93. On February 22, 2008, using coded language in a  
10 telephone conversation, defendant TAYLOR instructed defendant  
11 WALKER that defendant TAYLOR was driving to Seattle, Washington,  
12 in order to sell oxycodone to her customers.

13        94. On February 23, 2008, at 8:53 a.m., defendant JONES  
14 advised defendant TAYLOR not to travel to Seattle, Washington, by  
15 plane, to travel there by bus, and not to carry oxycodone pills  
16 himself.

17        95. On February 23, 2008, in Los Angeles County, defendant  
18 CARTER rented a vehicle.

19        96. On February 24, 2008, in Los Angeles County, defendant  
20 TAYLOR possessed a 9 mm Beretta semi-automatic pistol bearing  
21 serial number BER380148Z.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(C)]

Beginning on an unknown date, and continuing until on or about February 18, 2008, in Los Angeles County, within the Central District of California, defendant SHAUNTA TAYLOR, also known as "Capone," knowingly and intentionally possessed with intent to distribute approximately 41.9 grams of oxycodone, a schedule II controlled substance.

COUNT THREE

[18 U.S.C. § 924(c)(1)(A)]

Beginning on an unknown date, and continuing until on or about February 24, 2008, in Los Angeles County, within the Central District of California, defendant SHAUNTA TAYLOR, also known as "Capone," knowingly possessed a firearm, namely, a 9 mm Beretta semi-automatic pistol bearing serial number BER380148Z, in furtherance of a drug trafficking crime, namely, conspiracy to distribute, and possess with intent to distribute, oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as charged in Count One of the Indictment.

COUNT FOUR

[18 U.S.C. § 922(g)]

Beginning on an unknown date, and continuing until on or about February 24, 2008, in Los Angeles County, within the Central District of California, defendant SHAUNTA TAYLOR, also known as "Capone" ("TAYLOR"), knowingly possessed a firearm, namely, a 9 mm caliber Beretta semi-automatic pistol bearing serial number BER380148Z, in and affecting interstate and foreign commerce. Such possession occurred after defendant TAYLOR had been convicted of a felony punishable by a term of imprisonment exceeding one year, namely the following:

(1) Transportation/sale of a controlled substance, and possession of a controlled substance for sale, in violation of California Health and Safety Code Sections 11352(a) and 11351.5, in Los Angeles Superior Court, case number BA14487102, on or about August 13, 1997; and

(2) Robbery and shooting at a dwelling, in violation of California Penal Code Sections 211 and 246, in Los Angeles Superior Court, case number BA03185001, on or about October 8, 1991.

COUNT FIVE

[21 U.S.C. § 843(b)]

On or about January 31, 2008, in Los Angeles County, within the Central District of California, defendant WALTER KINCAID, also known as "Wa-Wa," knowingly and intentionally used a communication facility, namely, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to distribute and possess with intent to distribute oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

COUNT SIX

[21 U.S.C. § 843(b)]

On or about February 5, 2008, in Los Angeles County, within the Central District of California, defendant WALTER KINCAID, also known as "Wa-Wa," knowingly and intentionally used a communication facility, namely, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to distribute and possess with intent to distribute oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

COUNT SEVEN

[21 U.S.C. § 843(b)]

On or about February 13, 2008, in Los Angeles County, within the Central District of California, defendant MONIQUE DAVENPORT knowingly and intentionally used a communication facility, namely, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to distribute and possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

COUNT EIGHT

[21 U.S.C. § 843(b)]

On or about February 18, 2008, in Los Angeles County, within the Central District of California, defendant DEBRA BUTLER knowingly and intentionally used a communication facility, namely, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to distribute and possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

COUNT NINE

[21 U.S.C. § 843(b)]

On or about February 20, 2008, in Los Angeles County, within the Central District of California, defendant CHERYL LYNN TOUSAND knowingly and intentionally used a communication facility, namely, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to distribute and possess with intent to distribute oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

COUNT TEN

[21 U.S.C. § 843(b)]

On or about February 23, 2008, in Los Angeles County, within the Central District of California, defendant CURTIS JONES knowingly and intentionally used a communication facility, namely, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to distribute and possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

A TRUE BILL

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Foreperson

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